UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SEP 27 2012

Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft Prevention of Significant Deterioration (PSD) permit and Part 70 significant permit modification for Subaru of Indiana Automotive, Inc., permit numbers 157-31885-00050 and 157-31887-00050 respectively, located in Lafayette, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1.) The proposed project is subject to PSD requirements for volatile organic compounds (VOCs) under 326 IAC 2-2. As a result, a best available control technology (BACT) analysis is required to determine the control technology best suited for controlling VOCs. In the VOC BACT analysis, included as appendix C to the permit, carbon adsorption is eliminated as BACT because it is technically infeasible "by itself". Please explain what is meant by the use of "by itself" in the BACT analysis. If carbon adsorption is technically feasible in conjunction with other control technologies, please update the VOC BACT analysis to reflect this and determine whether carbon adsorption in combination with other technologies would constitute BACT for VOCs.

2.) Compliance with VOC emission rate limits established in condition D.4.4(a) is determined via condition D.4.4(b) through the use of an equation. However, condition D.4.4(b) refers to two equations, of which one is missing. Condition D.4.9 contains an equation that can be used to show compliance with VOC emissions limits. Please add to condition D.4.4(b) the equation used to determine compliance with the VOC emission rate limits or update the permit to show that the VOC emission rate is determined by the equation in condition D.4.9.

3.) Draft permit condition D.4.4(c) states that information necessary to calculate the overall efficiency required to meet VOC emission rate limits is still being collected. Please explain whether the relevant information has yet been collected. If so, please update the permit to reflect the overall efficiency. Otherwise, please explain when information sufficient to determine the overall efficiency is expected to be collected and whether the overall efficiency calculated in condition D.4.4(b) is still sufficient to ensure compliance with VOC emission rate limits.

4.) Conditions D.2.10(b) and D.3.10(b) state that the source shall determine the "three hourly average" thermal incinerator or oxidizer temperature from the most recent stack test that demonstrates compliance with the established VOC emission rate limits. The condition, as written, implies that there are three different one-hour average temperatures to be selected. However, conditions D.2.10(a) and D.3.10(a) require the source to take action when the temperature is below the single three-hour average determined from the most recent stack test. Please determine whether the temperature must be averaged over one hour or three hours and update conditions D.2.10 and D.3.10 accordingly.

5.) Condition D.2.13(a) requires the source to maintain six documents in order to document compliance with VOC PSD requirements. However, only four documents are listed. A similar issue also occurs in condition D.4.16(a). Please ensure that the permit requires all applicable records to be kept to document compliance with VOC PSD requirements and update the permit as necessary to list these records.

6.) Conditions D.2.6, D.3.7, D.4.9, D.5.4, and D.6.8 employ the use of sums to determine compliance with VOC emission limits. Please clarify in each permit condition that the sum is over all of the coatings used in each emission unit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

Genevieve Damico

Genevieve Damico
Chief
Air Permits Section